

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

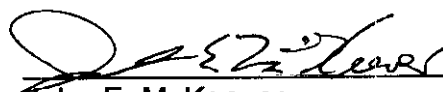
DOCKET NO. R97-1

**ANSWERS OF UNITED PARCEL SERVICE WITNESS
STEPHEN E. SELICK TO INTERROGATORIES OF
UNITED STATES POSTAL SERVICE
(USPS/UPS-T2-26 and 27)**

(February 11, 1998)

Pursuant to the Commission's Rules of Practice, United Parcel Service ("UPS") hereby serves and files the responses of UPS witness Stephen E. Sellick to interrogatories USPS/UPS-T2-26 and 27 of the United States Postal Service.

Respectfully submitted,


John E. McKeever
Attorney for United Parcel Service

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and

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(202) 861-3900

Of Counsel.

**ANSWER OF UNITED PARCEL SERVICE
WITNESS SELICK TO INTERROGATORY OF
THE UNITED STATES POSTAL SERVICE**

USPS/UPS-T2-26. Please confirm that you do not provide testimony on the average weight of Priority Mail pieces observed in IOCS, by shape, either in your direct testimony or in your workpapers. If not confirmed, please provide a reference, and explain how they were derived.

Response to USPS/UPS-T2-26. Not confirmed. Please see my workpaper UPS-Sellick-WP-1-VI-A for the average weight of Priority Mail pieces by shape and UPS-Sellick-WP-1-VI-B for the SAS code which derived these calculations.

**ANSWER OF UNITED PARCEL SERVICE
WITNESS SELICK TO INTERROGATORY OF
THE UNITED STATES POSTAL SERVICE**

USPS/UPS-T2-27.

a. Please confirm that the ODIS volumes reported in workpaper UPS-Sellick-1-III-A, page 2, are average daily volumes. If not, confirmed please explain fully.

b. Please confirm that when multiplied by 302 delivery days, the aggregate ODIS volume estimates for Priority Mail are within 5% of the BY 96 Priority Mail volume. If not confirmed, please explain fully.

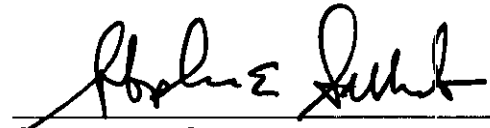
Response to USPS/UPS-T2-27.

(a) Confirmed.

(b) Confirmed. The total ODIS 1996 average daily volume for Priority Mail is 3,259,991. The total 1996 Priority Mail volume is 937,273 (000). $3,259,991 \times 302 = 984,517$ (000); $937,273 / 984,517 = 95\%$.

DECLARATION

I, Stephen E. Sellick, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.



Stephen E. Sellick

Dated: February 10, 1998

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.



John E. McKeever

Dated: February 11, 1998
Philadelphia, PA